

HONOLULU HIGH-CAPACITY TRANSIT CORRIDOR PROJECT

Section 106 Programmatic Agreement Historic Hawaii Foundation Comments

Since the beginning of the Section 106 Process for the Honolulu High-Capacity Transit Corridor Project, Historic Hawaii Foundation (HHF) has been an active participant. It has been involved in the eligibility and effect determination process as requested by the State Historic Preservation Division.

At the outset of the discussions on the programmatic agreement (PA) for the project, the HHF had the following major comments:

1. Database of all documentation developed for the project should be compiled and made available to the public
2. City should establish a Historic Preservation Program (Certified Local Government) and a Main Street Program
3. Project should preserve/restore historic resources not physically affected by project, such as Irwin and Walker Parks
4. Project should preserve/restore historic resources not within the Area of Potential Effect; such as through a rehabilitation grant program

Subsequent discussions on the PA resulted in the City agreeing to do the following to address HHF requests:

1. Consult on project infrastructure design and require review and comment on project plans
2. Prepare construction protection plan, plan monitoring program and vibration/noise management and remediation plan
3. Conduct various education efforts, such as a \$100,000 Humanities Program
4. Prepare/update National Register/National Historic Landmark nomination forms
5. Specific mitigation of direct impacts on historic resources, such as for lava rock curbs and Dillingham Boulevard true kamani trees
6. Monitor demolition permits to determine project impact on historic resources
7. Conduct cultural landscape and historic context studies

The requested establishment of a City Historic Preservation program or a Main Street program is beyond the scope of this project. Therefore, in lieu of establishing the historic preservation program, the City will have a project architectural historian and will establish a Historic Preservation Committee. The architectural historian will

coordinate the project with historic preservation. This Historic Preservation Committee will administer the \$2 million fund for exterior improvements to eligible/listed properties within the project's area of potential effect. HHF concurred with these actions.

The concern regarding mitigation of impacts to parks adjacent to the project has been addressed by the PA commitment to budget \$750,000 for the implementation of a park improvement plan that is to be developed under the PA. HHF concurred with this action.

The suggestion of a grant rehabilitation program has been included in the PA with the caveat that this program is limited to resources within the area of potential effect. This \$2 million program will be administered by the Historic Preservation Committee as previously described. HHF concurred with this action.

In its 11/5/09 letter, HHF provided additional comments on and amendments to the PA. This letter included comments on the following (with the City response in parentheses):

1. Should non-participants still be consulting parties. (The City responded that the entities listed are considered consulting parties.)
2. Mapping errors. (Corrections have been made.)
3. Federal lands/agency involvement. (Several federal agencies own land that would be required for project therefore those agencies would need to determine their respective Section 106 responsibilities instead of the City determining their roles.)
4. Archaeological surveys and plans. (City recognizes HHF deference to OIBC, but no change is suggested to the PA.)
5. Review and process questions. (SHPD comments to be considered, but concurrence is not required under federal guidelines. Review schedule will be established with SHPD. Kickoff meetings will be consolidated where possible.)
6. Inclusion of Dillingham Boulevard true kamani trees landscape plan in PA. (City committed to replacing true kamani trees prior to revenue service operation in PA. Landscaping and tree replacement plans to set forth specifications for trees.)

The issues that could not be accommodated are either not appropriate to be addressed in the PA or are outside the purview of the HHF. The City provided HHF with a response to its comments on 11/13/09, but HHF is apparently not satisfied with that response as evidenced by Kiersten Faulkner's email to FTA. She requested that FTA respond directly to HHF prior to finalizing the PA. The City is concerned about Ms. Faulkner's dissatisfaction with all the accommodations listed above

because the City believes it acted in good faith and has done everything possible within its authority. The latest list of comments and demands from Ms. Faulkner is primarily issues that are not within the City's or project's purview.